

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**UNITED STATES OF AMERICA**                      \*                      **CRIMINAL NO: 08-318**

**v.**    \*                      **SECTION: "C"**

**CHARLES WILLIAMS**    \*

\*                      \*                      \*

**FACTUAL BASIS**

Should the above captioned matter proceed to trial, the government would prove through the introduction of competent evidence, comprised of admissible tangible exhibits and witness testimony, the facts set forth hereinbelow. The defendant, Charles Williams, represented through undersigned counsel, hereby agrees and stipulates that the following facts constitute a sufficient factual basis for the crime to which the defendant has agreed to plead guilty:

A special agent with the U.S. Secret Service would testify that on December 15, 2004, he monitored a consensual-telephone call placed by a cooperating individual to the defendant, Charles Williams. The cooperating individual who placed the telephone call had just been taken into custody at the New Orleans Superdome in possession of a small quantity of counterfeit U.S. currency. This cooperating individual had advised the Secret Service agents that he could obtain more counterfeit money through Mr. Williams together with another individual. During the

phone call, Mr. Williams and the cooperating individual discussed the purchase of additional counterfeit money. The cooperating individual, acting on instructions of federal agents, advised Mr. Williams that he wanted to purchase \$1,000 of counterfeit Federal Reserve Notes, and Williams advised that he had the counterfeit money which he could sell.

One day later, on December 16, 2004, under the physical surveillance of U.S. Secret Service agents, the cooperating individual met with Mr. Williams at the Spur Discount Zone store on St. Claude Avenue in New Orleans, Louisiana. Mr. Williams entered the cooperating individual's automobile and delivered approximately \$1,000 of counterfeit Federal Reserve Notes in one-hundred dollar denominations. In return for the counterfeit money, the cooperating individual paid Mr. Williams \$500 in genuine currency.

The next day, December 17, 2004, the cooperating individual placed another consensually-monitored telephone call to Mr. Williams, during which call the defendant agreed to sell another sum of counterfeit currency, but this time to a federal undercover agent representing himself to be a counterfeit currency purchaser. The Government would prove through the testimony of the undercover agent, the cooperating source, and other surveillance agents, that Mr. Williams met with the undercover agent at the Spur Discount Zone store located on Causeway Boulevard in Metairie, Louisiana. At this meeting, Mr. Williams entered the automobile occupied by the undercover agent and the cooperating source. Mr. Williams then delivered approximately \$1,300 in counterfeit Federal Reserve Notes to the undercover agent. These notes were in one-hundred dollar denominations. The undercover agent would testify that he paid Mr. Williams a sum of genuine currency in return for the larger amount of counterfeit notes.

U.S. Secret Service agents would testify that they subsequently interviewed Mr. Williams, who admitted to having sold and passed the counterfeit money to the cooperating source and the undercover agent. Mr. Williams denied being the person responsible for manufacturing the counterfeit money and the Government's evidence would establish that another person was responsible for producing the counterfeit Federal Reserve Notes delivered to the cooperating individual and undercover agent. The Government would also introduce evidence establishing that the Federal Reserve Notes in the total sum of \$2,300 (as delivered and sold by defendant Williams) were scientifically analyzed by a forensic counterfeit currency expert and were determined to be, in fact, counterfeit United States currency.

**READ AND ACCEPTED BY:**

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CHARLES WILLIAMS  
Defendant

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PETER THOMSON  
Assistant United States Attorney

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JEFFREY SMITH  
Attorney for the Defendant